

THE HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

CYWEE GROUP LTD.,

*Plaintiff,*

v.

HTC CORPORATION and  
HTC AMERICA, INC.,

*Defendants.*

HTC CORPORATION and  
HTC AMERICA, INC.

*Third-Party Plaintiffs,*

v.

CYWEE MOTION GROUP LTD.,

*Third-Party Defendant.*

CASE NO. 2:17-cv-00932-JLR

JURY TRIAL DEMANDED

STIPULATED MOTION AND  
~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME

NOTE ON MOTION CALENDAR:  
DECEMBER 27, 2018

1 Third-Party Defendant CyWee Motion Group Ltd. ("CyWee Motion") and Third-Party  
2 Plaintiffs HTC Corporation and HTC America, Inc. (collectively "HTC") respectfully submit the  
3 following Stipulated Motion for Extension of Time, and in support thereof, state as follows:

4 1. On November 28, 2018, CyWee Motion filed a Motion for Summary Judgment.

5 2. Pursuant to LCR 7(d)(3), HTC filed a Response in Opposition on December 24,  
6 2018 and CyWee Motion's Reply Brief is currently on December 28, 2018.

7 3. On December 27, 2018, counsel for the parties conferred and agreed to a one-  
8 week of extension of CyWee Motion's deadline to file a Reply Brief in support of its Summary  
9 Judgment Motion. CyWee Motion requests the extension due to the fact that HTC's Response in  
10 Opposition was filed the day before the Christmas holiday, and counsel for CyWee Motion are  
11 traveling and/or on vacation due to the holidays and do not have sufficient time this week to  
12 prepare a Reply in advance of the current December 28 deadline. CyWee Motion requests that  
13 the deadline be extended an extra week due to counsel's unavailability for these reasons and  
14 because of the upcoming January 1, 2019 holiday.

15 4. Counsel for the parties called the Court's chambers to request the relief sought  
16 herein pursuant to LCR 7(i). The parties spoke with a clerk who advised that Your Honor and the  
17 clerk assigned to this case will not be in chambers today or tomorrow. The clerk further advised  
18 filing a motion requesting the extension sought herein.

19 5. This Motion is made for good cause and not for purposes of undue delay.

20 6. Accordingly, CyWee Motion respectfully requests that the Court grant the Motion  
21 and order that the deadline for CyWee Motion's Reply be extended to January 4, 2019.

22 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD  
23  
24  
25  
26

1 Dated this 27<sup>th</sup> day of December, 2018.

Respectfully submitted,

2 /s/Carmen E. Bremer

3 Carmen E. Bremer, WSBA 47,565  
carmen.bremer@bremerlawgroup.com  
4 BREMER LAW GROUP PLLC  
1700 Seventh Avenue, Suite 2100  
5 Seattle, WA 98101  
T: (206) 357-8442  
6 F: (206) 858-9730

7 Michael W. Shore\* (mshore@shorechan.com)  
Alfonso G. Chan\* (achan@shorechan.com)  
8 Christopher Evans\* (cevans@shorechan.com)  
Ari B. Rafilson\* (arafilson@shorechan.com)  
9 William D. Ellerman (wellerman@shorechan.com)  
Paul T. Beeler\* (pbeeler@shorechan.com)  
10 SHORE CHAN DEPUMPO LLP  
901 Main Street, Suite 3300  
11 Dallas, Texas 75202  
12 T: (214) 593-9110  
13 F: (214) 593-9111

14 \* Admitted *pro hac vice*

15 *Attorneys for Third-Party Defendant CyWee Motion*  
16 *Group Ltd.*

1 DATED: December 27, 2018

2 WILSON SONSINI GOODRICH & ROSATI

3 By: s/ Gregory L. Watts

4 Gregory L. Watts, WSBA # 43995

5 **WILSON SONSINI GOODRICH & ROSATI**

6 701 Fifth Avenue, Suite 5100

7 Seattle, WA 98104-7036

8 Telephone: (206) 883-2500

9 Facsimile: (206) 883-2699

10 Email: gwatts@wsgr.com

11 James C. Yoon, CA Bar #177155 (*pro hac vice*)

12 Ryan R. Smith, CA Bar #229323(*pro hac vice*)

13 Albert Shih, CA Bar # 251726 (*pro hac vice*)

14 Jamie Y. Otto, CA Bar # 295099 (*pro hac vice*)

15 **WILSON SONSINI GOODRICH & ROSATI**

16 650 Page Mill Road

17 Palo Alto, CA 94304-1050

18 Telephone: (650) 493-9300

19 Facsimile: (650) 565-5100

20 Email: jyoon@wsgr.com, rsmith@wsgr.com

21 ashih@wsgr.com, jotto@wsgr.com

22 Ty W. Callahan, CA Bar # 312548 (*pro hac vice*)

23 **WILSON SONSINI GOODRICH & ROSATI**

24 633 West Fifth Street, Suite 1550

25 Los Angeles, CA 90071-2027

26 Telephone: (323) 210-2900

Facsimile: (866) 974-7329

Email: tcallahan@wsgr.com

*Attorneys for Defendants and Third-Party Plaintiffs*

*HTC Corporation and HTC America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

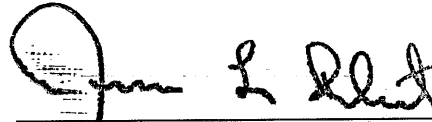
Dated: December 27, 2018

/s/ Carmen E. Bremer

Carmen E. Bremer

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: December 27, 2018



The Honorable James L. Robart United  
States District Court Judge